1 SO. CAL. EQUAL ACCESS GROUP Jason J. Kim (SBN 190246) Jason Yoon (SBN 306137) 101 S. Western Ave., Second Floor Los Angeles, CA 90004 Telephone: (213) 252-8008 Facsimile: (213) 252-8009 scalequalaccess@yahoo.com 2 3 4 5 Attorneys for Plaintiff KORTTNEY ELLIOTT 6 7 UNITED STATES DISTRICT COURT 8 CENTRAL DISTRICT OF CALIFORNIA 9 10 KORTTNEY ELLIOTT, Case No.: 2:22-cv-03754 FLA (AFMx) 11 Plaintiff, Plaintiff's Notice of Motion and Motion for Default Judgment by Court 12 VS. Date: October 7, 2022 Time: 1:30 p.m. 13 GOOD LIFE ENTERPRISES, L.L.C.; and 14 Courtroom: 6B DOES 1 to 10, 15 Honorable Judge Fernando L. Aenlle-Defendants. Rocha 16 17 18 19 20 To Defendant GOOD LIFE ENTERPRISES, L.L.C. and the attorneys of record, if 21 any: Please take notice that on October 7, 2022, at 1:30 p.m., or as soon thereafter as this 22 matter may be heard by this Court located at 350 W. First Street, Los Angeles, California, 23 Plaintiff KORTTNEY ELLIOTT will present Plaintiff's motion for default judgment 24 against Defendant GOOD LIFE ENTERPRISES, L.L.C. The Clerk has previously 25 entered the default on said Defendant on August 3, 2022. 26 At the time and place of hearing, Plaintiff will present proof of the following 27 matters: (1) Defendant GOOD LIFE ENTERPRISES, L.L.C. is not a minor or 28 incompetent person or in military service or otherwise exempted under the Soldier and

Sailor's Civil Relief Act of 1940; (2) Defendant GOOD LIFE ENTERPRISES, L.L.C. 1 has not appeared in this action; and (3) Plaintiff is entitled to judgment against said 2 Defendant on account of the claims pleaded in the complaint, to wit: a violation of the 3 Americans with Disabilities Act. 4 The Plaintiff seeks a judgment in the amount of \$2,627.00 in attorney fees and 5 costs as set forth in the attached declaration of Jason J. Kim and an Order directing the 6 Defendant to: make alterations in such a manner that, to the maximum extent feasible, the 7 goods, services, facilities, privileges, advantages, or accommodations offered by 8 Defendant is readily accessible to and usable by individuals with disabilities at the 9 property located at or about 8607 Valley Blvd., Rosemead, California. This motion is 10 based on this notice, the declarations submitted in support of this motion, and other 11 matters which may be presented at the hearing. 12 Notice of the original motion for default judgment by court was served on 13 Defendant GOOD LIFE ENTERPRISES, L.L.C. on September 2, 2022 by first class 14 United States Mail, postage prepaid. 15 16 Dated: September 2, 2022 SO. CAL. EQUAL ACCESS GROUP 17 18 19 /s/ Jason J. Kim By: 20 Jason J. Kim, Esq. 21 Attorneys for Plaintiff 22 23 24 25 26 27 28